

**REMARKS**

Applicant requests reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 1-17 are pending in the present application. Claims 1 and 10 are the independent claims.

Claims 1 and 10 have been amended. No new matter has been added.

Claims 1, 2, 7-11 and 15-17 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,995,267 (Paoli). Claims 3, 4, 12 and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over (Paoli) in view of U.S. Patent No. 5,636,049 (Kawata et al.). Claims 5, 6 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over (Paoli). All rejections are respectfully traversed.

Independent claims 1 and 10 recite, inter alia, a light source unit generating a plurality of laser beams of unpolarized light.

However, none of the asserted citations teaches or suggests at least the aforementioned features. Accordingly, while not conceding the propriety of the asserted combination, the asserted combination is likewise deficient.

Paoli relates to a time division multiplexing multiple beam raster output scanning system and discusses an arrangement including a multiple beam laser source 104 and a static polarization separator 210 (Paoli, FIGS. 1 and 2). In operation, a first laser of the laser source 104 emits beams 202 and 204 polarized in a TM-polarization mode while a second laser of the laser source 104 emits beams 206 and 208 polarized in a TE-polarization mode. (Paoli, Col. 5, lines 7-14). Indeed, these polarized beams are separated by the static polarization separator so that TM beams are directed to beam separator 212 while TE beams are directed to beam separator 220. (Paoli, FIG. 2). Thus, Paoli teaches away from the aforementioned features of independent claims 1 and 10.

Accordingly, favorable reconsideration and withdrawal of the rejection of independent claims 1 and 10 under 35 U.S.C. § 102 are respectfully requested.

Regarding the rejection of claims 3, 4, 12, and 13 under 35 U.S.C. § 103, Kawata et al. relates to a mechanism for scanning the inner periphery of a drum in an image forming apparatus and is cited for its alleged teaching of a cylindrical lens between the laser source and polarizers. (Office Action, page 4). Applicant respectfully submits that Kawata et al. adds

nothing to the teachings of Paoli to remedy the aforementioned deficiency.

Accordingly, favorable reconsideration and withdrawal of the rejection of claims 3, 4, 12, and 13 under 35 U.S.C. § 103 are respectfully requested.

Regarding the rejection of claims 5, 6, and 14 under 35 U.S.C. § 103, it is respectfully submitted that Paoli cannot suggest at least the aforementioned features of independent claims 1 and 10 at least for the reasons set forth above.

Accordingly, favorable reconsideration and withdrawal of the rejection of claims 5, 6, and 14 under 35 U.S.C. § 103 are respectfully requested.

In view of the foregoing, Applicant respectfully submits that the independent claims patentably define the present invention over the citations of record. Further, the dependent claims should also be allowable for the same reasons as their respective base claims and further due to the additional features that they recite. Separate and individual consideration of the dependent claims is respectfully requested.

Applicant believes that the present Amendment is responsive to each of the points raised by the Examiner in the Official Action. However, if there are any formal matters remaining after this response, The Examiner is requested to telephone the undersigned to attend to such matters.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: 2-8-06

By: Michael E. Kondoudis  
Michael E. Kondoudis  
Registration No. 42,758

1201 New York Avenue, NW, Suite 700  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501